

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al;

Plaintiffs,

v.

DONALD J. TRUMP, et al;

Defendants.

Case No.:

DECLARATION OF ANIND DEY

I, Anind K. Dey, hereby declare:

1. I am a resident of the State of Washington. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge, except as to those matters stated upon information and belief. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am the Dean of the University of Washington Information School (iSchool). I have been Dean of the iSchool since January 2018. The iSchool includes undergraduate and graduate programs in the fields of informatics, library science, information management, and museum studies. The iSchool has roots dating back over 100 years, when the University of Washington established a program for educating untrained librarians in the Pacific Northwest. The iSchool is nationally recognized for its leadership on information literacy and librarianship in the 21st century.

3. I am aware of an Executive Order titled “Continuing the Reduction of the Federal Bureaucracy,” which directs several small agencies, including the Institute of Museum and Library Services (IMLS), to “eliminate [their] non-statutory components and functions” and “reduce the performance of their statutory functions and associated personnel to the minimum presence and function required by law.” If not stopped, this Executive Order and the minimalization of IMLS will cause significant, existential harm to the UW iSchool and libraries and librarians writ large.

4. As the Dean of the UW iSchool, I am aware of the federal grants our faculty receive from IMLS to fund their research and scholarship. iSchool faculty currently receive eleven grants totaling \$3.3 million. As detailed below, if this funding is lost, many of these projects will be forced to stop. In addition, critical funding for paying graduate students would be lost. The iSchool has some general account funding that it can provide to partially fill the gap, but I can only commit to doing so through the end of this academic year.

5. For example, iSchool faculty receive a number of grants through the Laura Bush 21st Century Librarian Program. The Laura Bush 21st Century Librarian Program supports large-scale, robust professional training programs for libraries and librarians, which ultimately ensures that all communities—including rural communities—have access to high quality library services.

IMLS is the only funder of the Laura Bush 21st Century Librarian Program. The Laura Bush grants received by iSchool faculty include:

a. *Empowering Neurodivergent Librarians to Lead Inclusion in Libraries.*

This project researches the capacity of libraries to recruit, onboard, retain, and advance neurodivergent librarians. The project includes conducting interviews with neurodivergent librarians, library supervisors, and peer employees; conducting a nation-wide survey of neurodivergent librarians; creating a curricular module using participatory design; and delivering training at American Library Association and MLIS programs. The project will produce training programs to be used across libraries and information schools to foster inclusivity of neurodivergent library staff. iSchool faculty received an award of \$491,500 for a multi-year project and runs through July 31, 2025.

b. *Valuing Library and Archives Labor: Assessing the Implications of Internships and Fellowships on the Library and Archives Community.* This research examines how internships and fellowships impact the recruitment, training, and retention of a diverse workforce in libraries and archives. The underrepresentation of racial and ethnic minorities in library and archives workforces limits those institutions' abilities to effectively serve diverse communities. This project is funded by a \$318,989 grant and runs through July 31, 2025. Without research-driven strategies to address these disparities, libraries and archives will continue to struggle to meet the information needs of all Americans, undermining their mission to

provide equitable access to knowledge. This funding also supports a PhD student.

- c. *Open-Source Hardware Assembly, Repair, and Sustainability.* This program develops tools for scientists and clinicians to better document, share, and assemble software, and enables scientific instruments to be shared in cost-effective ways. The UW iSchool is one of the only laboratories in the United States supporting open-source hardware of this kind. This grant funds the work and stipends of two PhD students. The program is funded by a \$317,332 grant and runs through July 31, 2025.

6. The UW iSchool also receives a number of IMLS grants through its National Leadership Grants for Libraries Program. The National Leadership Grants for Libraries Program supports projects that develop, enhance, or disseminate replicable practices, programs, models, or tools to strengthen library and archival services for the American public. National Leadership Grants received by iSchool faculty include:

- a. *Misinformation Media Literacy: Supporting Libraries as Hubs for Misinformation Education.* The goal of this grant is to build a national media literacy program, designed specifically for librarians, to help everyday citizens identify and deal with online scams, deepfakes, and other challenges in today's online environments. The program has already trained over 1,000 librarians and others. This project is funded by a \$749,727 grant, and runs through September 30, 2026. If this grant is lost, the program would have to be shut down—including all resource

development, websites, and training sessions for librarians who use these resources.

- b. *Supporting the development of digital playful exploratory resources to combat mis/disinformation through online intergenerational co-design.*

This project uses co-design methods with children, teens, educators, and librarians to develop (1) a flexible tabletop role-playing game focused on digital civic engagement and (2) a curriculum that helps librarians design their own activities to support youth. This project is funded by a \$249,917 grant and runs through January 31, 2026. If this grant is lost, work on the project will have to stop, which would mean losing an unfinished prototype of a potentially strong game-based learning curriculum that helps youth navigate challenges such as misinformation, cyberbullying, trolling, sexting, and other online risks.

- c. *Scaling Community Through Archives: A National Program to Expand Community Archives.* In conjunction with the Tacoma Public Library and Internet Archive, this project examines how urban and rural public libraries can develop and sustain community archives. The project equips public library staff with the skills and resources necessary to document their communities' histories, ensuring that local stories are preserved for future generations. This project is funded by a \$399,485 grant, and runs through July 31, 2027. If this grant is lost, the project will be forced to shut down; this would mean halting training sessions and resource development and ending financial support for eight public library partners.

It would further mean community archive projects, particularly those representing marginalized or underrepresented communities, would be lost from the official historical record and our collective memory.

- d. *Improving Access to Critical Games for Game Education at Cultural Heritage Institutions.* This research project, in collaboration with the Video Game History Foundation and The Strong National Museum of Play, aims to improve access to significant games in game education and cultural heritage institutions and aims to establish best practices for wider access by researchers, educators, and archivists. This project is supported by a \$249,628 grant and runs through July 31, 2026. Losing this grant would hinder efforts to identify and preserve historically significant video games and would diminish the ability to preserve and study video games as a vital part of American cultural heritage and technological history.
- e. *LIS Forward: Shaping Future Directions for LIS in iSchools.* This grant supports engagement and coalition building across information schools and the library profession to strengthen research and education that broadly and directly benefits libraries and students of librarianship. This project is funded by a \$149,832 grant and runs through August 31, 2025. Without this grant, the iSchool would need to discontinue outreach and engagement activities. The loss will undermine academic and professional endeavors to improve librarianship programs to support the needs of libraries and the communities they serve.

- f. *This Site is Fake Dot Com.* This grant supports collaboration between researchers and public and K-12 librarians to create resources and programs for teaching information literacy skills to youth. This project is funded by a \$249,884 grant and runs through July 31, 2027. This project will be shut down immediately if funding is lost. The project was about to launch a series of workshops for their cohort of 13 libraries. These partner libraries would also collectively lose \$39,000 over the period of the grant. In addition, the termination of this program would result in the loss of library staff training opportunities, information literacy resources, curricula, and other support for literacy programs, and online access to project resources.
- g. *Supporting the Development of Youth Digital Civic Engagement Through the Co-Design of Table-Top Games.* This project focuses on the co-design of digital play-based resources to help librarians support youth around mis- and disinformation learning. Losing this grant would mean that iSchool faculty cannot run final testing and evaluation on the designs to understand the potential learning impact of the project.

7. iSchool faculty also receive federal IMLS funding as subrecipients of other institutions' grant awards, and had anticipated additional funding in the coming months.

8. As detailed above, the IMLS is a significant source of funding for the iSchool's academic research and outreach activities to libraries and librarians across Washington State. IMLS is the most significant funder of libraries, archives, and museums, driving innovation and essential services nationwide. Although it composes only a small portion of the overall federal


budget, its impact is far-reaching. It is one of the few federal agencies devoted to the pursuit of creating a public that is well-informed—a vital public good.

9. As of the date of this declaration, iSchool faculty have not lost any grants directly awarded to them. However, I have learned that two of the iSchool's Ph.D. students received funding through a University of South Carolina program funded by IMLS that was terminated effective April 1, 2025. Based on the notice I saw, that grant was terminated because it was “inconsistent” with IMLS’ priorities and because of the Executive Order. I fear that this is only the first in a long line of grant terminations that will impact iSchool faculty and students.

10. Beyond the immediate loss of funding to the iSchool, eliminating IMLS support would disrupt vital community programs, like job skills training, English language classes, and internet access, and would hobble programs for supporting and developing the librarianship profession. These harms would be acutely felt by rural and tribal libraries that are already under-resourced and at risk. If iSchool faculty are forced to end partnerships with these libraries, I worry that some of them may be forced to reduce their services, if not entirely close. Losing IMLS funding will end one of the primary sources for building the capacity of thousands of libraries across the United States to support their communities.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED and SIGNED this 3rd day of April 2025, at Seattle, Washington.



ANIND K. DEY, PH.D.